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May 21, 2025

## **VIA ECF**

Vernon S. Broderick, United States District Judge United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

**Re:** Bernier et al. v. Gard Recycling, Inc. et al.,

Case No.: 23-CV-761 (VSB)

## Dear Judge Broderick:

We represent Plaintiffs in the above matter. We write to respectfully request that the Court grant Plaintiffs one additional week, until May 30, 2025, to finalize their motion for default judgment. Plaintiffs obtained Clerk's Certificates of Default for each Defendant on May 21, 2025, and expect to finalize the moving documents by the proposed deadline. We therefore respectfully request that the Court adjourn the deadline to May 30, 2025.

Thank you for your attention to this matter.

Respectfully Submitted,

/s/

Michael Taubenfeld

APPLICATION GRANTED
SO ORDERED A John S. BRODERICK
U.S.D.J.

Date: May 22, 2025

This is Plaintiffs' fourth request for an extension of time to move for default judgment. This will be the last time I grant an extension.